Devon Zastrow Newman, OSB #014627

Email dnewman@schwabe.com SCHWABE, WILLIAMSON & WYATT, P.C. 1211 SW 5th Ave., Suite 1900

Portland, OR 97204 Telephone: 503.222.9981 Facsimile: 503.796.2900

William A. Brewer III, appearing pro hac vice Email wab@bickelbrewer.com
Michael J. Collins, appearing pro hac vice
Email mjc@bickelbrewer.com
C. Dunham Biles, appearing pro hac vice
Email cdb@bickelbrewer.com
BICKEL & BREWER
4800 Comerica Bank Tower
1717 Main Street
Dallas, TX 75201-4612

Telephone: 214.653.4000 Facsimile: 214.653.1015

Of Attorneys for Plaintiff FLIR Systems, Inc.

## UNITED STATES DISTRICT COURT

## DISTRICT OF OREGON

## PORTLAND DIVISION

**FLIR SYSTEMS, INC.,** an Oregon Case No. 3:10-CV-971-HU corporation,

Plaintiff, FLIR'S MEMORANDUM IN SUPPORT

OF UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE

RESPONSE TO FLUKE'S MOTION TO COMPEL RESPONSES TO REQUESTS FOR PRODUCTION AND

FOR PRODUCTION AND INTERROGATORIES

Defendants.

2 4.4.........

FLIR Systems, Inc. (hereafter "FLIR") submits this Memorandum in Support of FLIR's Unopposed Motion for Extension of Time to file its response to Defendant Fluke's Motion to Compel Responses to Requests for Production and Interrogatories. Defendants Fluke Corporation (hereafter "Fluke") and Sierra Media, Inc. (hereafter "Sierra") do not oppose the

deadline extension sought by this motion.

Plaintiff FLIR's response is currently due on November 21, 2011. FLIR respectfully requests the date for its response be extended by one day, to November 22, 2011.

FLIR requests this additional time to file its response because depositions in this case are being held on November 17 and November 21 and FLIR's counsel will be traveling away from the office for these depositions. This one day extension will allow FLIR's counsel and FLIR to finalize the response after the depositions have been completed. Counsel for Defendants Fluke and Sierra do not oppose this motion, which is made in good faith and not for the purposes of delay. The requested extension will not require any change in any other case management dates that have been set by the Court.

Dated this 17<sup>th</sup> day of November, 2011.

SCHWABE, WILLIAMSON & WYATT, P.C.

By: s/ Devon Zastrow Newman
Devon Zastrow Newman, OSB #014627
Telephone 503.222.9981

## **BICKEL & BREWER**

William A. Brewer III, appearing pro hac vice Michael J. Collins, appearing pro hac vice C. Dunham Biles, appearing pro hac vice Telephone 214.653.4000

Of Attorneys for Plaintiff, FLIR Systems, Inc.